

# Exhibit C



**From:** Kristopher Davis kdavis@raklaw.com  
**Subject:** Re: Headwater v. Samsung (EDTX-103) | Supplemental Expert Reports  
**Date:** October 31, 2024 at 11:03 AM  
**To:** [SERVICE FR] Samsung-Headwater SERVICEFRSamsung-Headwater@fr.com, qe-headwater103  
qe-headwater103@quinnemanuel.com, melissa@gillamsmithlaw.com, tom@gillamsmithlaw.com  
**Cc:** headwater@raklaw.com

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Counsel for Samsung,

I believe we are still awaiting Samsung's position on our motion for leave. We have discussed this with you by phone previously (and with the Court at the related discovery hearing), and you have now had several days to review the brief supplements from Mr. de la Iglesia and Mr. Dell. You have also now completed those witnesses' depositions. Please provide your position today. If we do not receive it, we will point this out in our motion tomorrow.

Regards,  
Kris

Kristopher Davis  
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On Oct 25, 2024, at 7:56 PM, Kristopher Davis <kdavis@raklaw.com> wrote:

Counsel for Samsung,

Please find below a link to download the supplemental expert reports of Stephen Dell and Erik de la Iglesia. A password will follow momentarily. As discussed on our meet-and-confer and consistent with the Court's guidance at the hearing on Headwater's motion to compel, Headwater intends to file a motion for leave as to these supplemental reports. During our call, Samsung was not able to confirm whether it would oppose the motion. Please review the reports and let us know on **Monday, October 28** whether Samsung will oppose the motion for leave.

<https://rak-dm01.raklaw.com/docmoto/share/QmW165OfwaJn>

Regards,  
Kris

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